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Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

RONELL KOEPPEN, individually,
 and on behalf of other members of the
 general public similarly situated and
 on behalf of other aggrieved
 employees pursuant to the California
 Private Attorneys General Act,

Plaintiff,

vs.

CARVANA, LLC an unknown business
 entity; and DOES 1 through 100,
 inclusive,

Defendants.

Case No.: 3:21-CV-01951-TSH

Honorable Thomas S. Hixson
 Department E

CLASS ACTION

**DECLARATION OF RONELL
 KOEPPEN IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT AND
 CLASS REPRESENTATIVE
 ENHANCEMENT PAYMENT**

[Plaintiff's Notice of Motion and Motion
 for Final Approval of Class Action
 Settlement and Class Representative
 Enhancement Payment; Declaration of
 Settlement Administrator (Nick Castro);
 and [Proposed] Order Granting Final
 Approval of Class Action Settlement and
 Judgment filed concurrently herewith]

Date: August 22, 2024
 Time: 10:00 a.m.
 Courtroom: E

Complaint Filed: December 16,
 2020
 FAC Filed: February 22, 2021
 Removed: March 19, 2021
 Trial Date: None Set

DECLARATION OF RONELL KOEPPEN

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DECLARATION OF RONELL KOEPPEN

I, Ronell Koeppen, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Carvana, LLC (“Defendant” or “Carvana”), in an hourly-paid, non-exempt position as a Market Operations Associate from approximately January 2020 to approximately July 2020. I decided to seek legal advice about my work experiences with Carvana and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure that Carvana was held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **9 hours**. Afterwards, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Carvana, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Carvana. I routinely checked in with my attorneys and their staff to make sure they had all of my most current information and any additional information that I had obtained.

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1 4. Throughout my involvement in this case, I was available to speak and
2 meet with my attorneys whenever they needed me. I responded to them as quickly
3 as possible and gave them as much information and identified as many documents
4 as I could. I spent at least **12 additional hours** speaking with my attorneys about
5 the case, identifying potential witnesses, providing my attorneys with documents
6 and information concerning the case, and also describing policies, practices, and
7 procedures of Carvana.

8 5. As far as the settlement is concerned, I was available to review
9 documents and answer any questions my attorneys had. I spent about **3 hours**
10 reviewing the settlement documents and about **2 hours** asking questions and
11 discussing the settlement with my attorneys before signing the settlement
12 agreement.

13 6. I believe that I have done everything that my attorneys have asked of
14 me and have tried, to the best of my ability, to represent the class. I think my
15 efforts have helped to obtain the result in this case, and as a class representative, I
16 respectfully request that the Court award me a class representative enhancement
17 payment in the amount of \$7,500.00 for my active participation in this case.
18 Taking into consideration the time that I have dedicated to this case, I believe that
19 this amount is reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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1 8. I have not entered into any undisclosed agreements, nor have I
2 received any undisclosed compensation in this case. The only compensation I will
3 receive is whatever amount the Court awards as a class representative enhancement
4 payment, as well as my share of the settlement as a class member.

5
6 I declare under penalty of perjury under the laws of the State of California
7 that the foregoing is true and correct.

8 11/29/2023

9 Executed this ____ day of November 2023, at Fremont, California.

10
11 The image shows an electronic signature box. Inside the box, the name "Ronell Koeppen" is written in a stylized, handwritten font. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2023-11-29 18:09:49 UTC - 172.58.129.135" are displayed. Below the signature, the text "Nintex AssureSign®" is visible, followed by a long alphanumeric string "0c576981-2865-4077-a2c0-b0c90129a814".

12 Ronell Koeppen

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